

From: [ANDERSON Jim M](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)
Cc: [MCCLINCY Matt](#); [PETERSON Jenn L](#); [POULSEN Mike](#)
Subject: LWG's Biota FSP
Date: 08/16/2007 01:51 PM

Eric & Chip,

We reviewed the LWG's 8/10/07 draft "*RD 3B FSP for Fish & Invertebrate Tissue & Collocated Surface Sediment*". Unfortunately (b) (6) & wasn't able to review the FSP. We briefly discussed our comments in yesterday's TCT mtg. Here are DEQ's final comments on the draft FSP.

1) Sample collection outside Study Area (LWG's cover letter)- In their cover letter, the LWG states that the FSP does not include sampling outside the Study Area, RM 2 to 11. We understand EPA will, if necessary, direct the LWG to sample outside the Study Area (RM 2-0.5 & RM 11-12). We support EPA's position.

2) "No additional sampling" (p.4)- In the 1st full paragraph of page 4, the LWG attempts to restrict any further sampling if samples do not meet stated targets. While we believe the scope of work for this FSP is adequate enough not to require additional sampling, we're uncomfortable with the FSP text.

3) Target Analytes (Table 2-2)- Neither SVOCs, phenols, nor PCDD/Fs are included as target analytes for sculpin or collocated sediment at sculpin sites. I understand that is because sculpin are not fish considered in the HH risk assessment & because all 3 COIs screened-out for eco risk. I recommend these 3 COIs be included as target analytes because: 1) we don't necessarily agree with the risk screening, & 2) the risk screening doesn't evaluate risk posed to the sculpin predators with sculpin as prey.

Hey,

(b) (6)

James M. Anderson
Manager, Portland Harbor Section
DEQ NWR
Phone (503) 229-6825
Cell (971) 563-1434
Fax (503) 229-6899